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PROPOSED COUNSEL FOR THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA AND SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	JOINTLY ADMINISTERED
	§	

**AGENDA OF MATTERS SCHEDULED FOR HEARING ON
MARCH 4, 2020 AT 1:30 P.M. (CT)**

UNCONTESTED MATTERS GOING FORWARD:

1. Application for an Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtors [Docket No. 82]

Response/Related Documents: Amended Declaration of Patrick J. Neligan, Jr. in Support of Application for an Order Authorizing the Retention and Employment of Neligan LLP as Counsel the Debtors [Docket No. 267]; and

The Official Committee of Unsecured Creditors' Comment with Respect to (1) Application for an Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtors [Dkt. No. 82]; and (2) Debtors' Application for Entry of an Order Authorizing and

¹ The last four digits of Debtors' taxpayer identification number are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors [Dkt. No. 132] [Docket No. 269].

Status: This matter is going forward.

2. Debtors' Motion to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Certain Professionals [Docket No.112].

Response/Related Documents: None.

Comments: No party has filed an opposition to the relief requested in this motion and Debtors and Committee have agreed to the form of order.

Status: This matter is going forward.

3. Debtors' Application for Entry of an Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors [Docket No. 132].

Response/Related Documents: The Official Committee of Unsecured Creditors' Comment with Respect to (1) Application for an Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtors [Dkt. No. 82]; and (2) Debtors' Application for Entry of an Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors [Dkt. No. 132] [Docket No. 269].

Status: This matter is going forward.

POTENTIALLY CONTESTED MATTERS GOING FORWARD:

4. Debtors' Motion for an Order Authorizing the Employment and Payment of Professionals Utilized in the Ordinary Course of Business [Docket No. 90].

Response/Related Documents: None.

Comments: No party has filed an opposition to the relief requested in this motion. The Debtors and Committee have agreed to the form of order on the motion. The Debtors have received informal comments to the order from the United States Trustee and continue to work with the United States Trustee to reach an agreement on the proposed form of order. In the event the Debtors and United States Trustee are unable to resolve all issues by agreement, the Debtors will present any remaining issues to the Court for resolution.

Status: This matter is going forward.

Dated: March 3, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.
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